



Minnesota Pollution Control Agency

879 P

September 26, 1996

CERTIFIED MAIL NO. P 268 038 793
RETURN RECEIPT REQUESTED

Mr. Keith J. Buttleman, Director
Environmental Planning and Evaluation Department
Environmental Services Division
Metropolitan Council
Mears Park Centre
230 East Fifth Street
St. Paul, Minnesota 55101

RE: Notice of Noncompliance for June 18, 1996, Performance Test (Test) on Incinerator No. 7,
Emission Point No. 3 Pursuant to Air Emission Permit No. 879-90-OT-3, Requiring
Testing

Dear Mr. Buttleman:

The Air Quality Division (AQD) staff of the Minnesota Pollution Control Agency (MPCA) has reviewed the final test report (report) for the test conducted on the emission unit(s) referenced above at the Metropolitan Council Environmental Services (Company) facility located in St. Paul, Minnesota.

AQD staff has determined that the report demonstrates the following under test conditions while combusting natural gas:

SUMMARY OF PERFORMANCE TEST RESULTS

Emission Unit Tested	Limitation Basis	Pollutant and Emission Limit	Test Result	Compliance Status
Incinerator No. 7 (Emission Point No. 3)	40 CFR § 60.152 (a)(1)	Particulate Matter (PM): 1.3 lb/dry ton sludge charged	1.41 lb/dry ton sludge charged ¹	Noncompliance
	Minn. R. 7011.1310 A	Particulate Matter (PM): 1.3 lb/dry ton sludge charged	1.53 lb/dry ton sludge charged ²	Noncompliance
	40 CFR § 60.152 (a)(2)	Opacity: Not to exhibit 20% opacity or greater	Maximum observed opacity reading was 10% and Highest 6-minute opacity readings was <10%	Compliance
	Minn. R. 7011.1310 B	Opacity: Not to exhibit 20% opacity or greater	Maximum observed opacity reading was 10% and Highest 6-minute opacity readings was <10%	Compliance
	Not Applicable	Carbon Monoxide	187 ppm	Methodology Acceptable

¹ Test results reported as filterable particulate matter as determined by EPA Method 5.

² Test results reported as filterable plus condensable particulate matter as determined by EPA Method 5 and Minn. R. 7011.0725.

In addition, please be advised of the following:

1. The Enforcement Unit has been informed of the noncompliance status for particulate matter. The Enforcement Unit will review the results of this test along with the results of the retest in order to determine the appropriate enforcement action, which may include a monetary penalty assessment.

2. A retest will be required to determine compliance for particulate matter emissions.

Please be advised that upon receiving written notice of a second performance test failure, the Company shall voluntarily shut down the noncompliant emission unit(s) unless the Company meets the requirements of Minn. R. 7017.2025, subp. 5. A second test failure is also grounds for escalated enforcement action and a penalty assessment.

3. The Company shall comply with either of the following two options:

OPTION A:

- i. Conduct a retest for each of the pollutants identified in Item 1 on or before thirty (30) days after receipt of this letter.
- ii. Provide advance written notice of testing, submit a test plan and schedule a pretest meeting at least twenty-one (21) days prior to the retest date. The pretest meeting shall be held at least seven (7) working days prior to the date of the retest.
- iii. Submit the final performance test results to the Compliance Determination Unit (CDU) Supervisor within forty-five (45) days of conducting the retest. The cover letter shall indicate that the results are for a retest and that the retest was conducted due to a determination of noncompliance.
- iv. Include with the final test results a description of corrective action taken by the Company to achieve compliance. If AQD staff determine that compliance has been demonstrated, the Company shall incorporate this corrective action into its standard operating procedures.
- v. Submit a microfiche version of the final test report to CDU within one hundred and five (105) days of conducting the retest. A signed cover letter indicating that the content of the microfiche is a duplicate of the actual report must be sent with the microfiche. Microfiche copying services are available by contacting the State Department of Administration - Micrographics Services Unit at (612)779-5200. The complete permit number, complete facility name and the exact date of testing must be provided.

OPTION B:

- i. If the Company can demonstrate a need for an extension to the retest schedule beyond the reasons cited in Minn. R. 7017.2025, subp. 4(D), the Company shall enter into a Schedule

of Compliance with the MPCA. To do this, the Company must submit a proposed compliance plan which specifies the reason(s) why the extension is needed and a proposed alternative retest schedule. The proposed compliance plan shall be submitted on or before thirty (30) days after the receipt date of this letter. The proposed compliance plan also must include a detailed summary of the measures the Company will take to bring the affected unit(s) into compliance. The proposed compliance plan is subject to the commissioner's written approval. Once approved, the owner or operator must implement the alternative retest schedule and compliance measures.

The compliance plan will then be incorporated into the Schedule of Compliance, which is to be signed by a Company official. The Schedule of Compliance requires the Company to pay a civil penalty if the compliance plan is not followed and may also require additional corrective action. For the purpose of enforcing the emission limit, the period of noncompliance begins at the date of the initial noncompliant performance test. Therefore, the Company should take measures to minimize emissions prior to receiving written notice of a performance test failure. The compliance plan may also include a detailed summary of additional measures the owner or operator will implement if the retest demonstrates noncompliance.

4. The test was conducted under the operating conditions listed in the table below.

Test Date	Process Feed Rate	Control Equipment Operation Range	Control Equipment Operation Range
June 18, 1996	3.04 dry ton/hr sludge charged	QuadCyclone: 4.8-6.0" H ₂ O Venturi: 28.2-29.1" H ₂ O Sub-cooler: 3.3-4.4" H ₂ O	Pre Cooler: 216-226 gpm Venturi: 250-252 gpm Sub Cooler: 1451-1555 gpm

Hearth No.	Average Operating Temperature	Minimum Operating Temperature
0	1326 ° F	1273 ° F
1	1298 ° F	1183 ° F
2	1586 ° F	1514 ° F
3	1688 ° F	1659 ° F
4	1386 ° F	1332 ° F
5	1200 ° F	1105 ° F

Mr. Keith J. Buttleman
Page Five
September 26, 1996

5. The following production operating limit applies pursuant to Minn. R. 7017.2025, subp. 3. This limit applies in addition to any operating limit or requirement that already exists and it does not serve to relax any limit or requirement except where prior authorization has been given by AQD staff.

Emission Unit	Production Limit	Averaging Method
Incinerator No. 7 (Emission Point No. 3)	3.04 dry tons sludge charged	Shift Basis: Divide total tons processed by total operating time in an eight hour shift. Down time of 15 or more minutes is not to be included as operating time.

The Company may not operate an emission unit at a higher production rate than that listed in the above table unless it conducts a performance test at a higher rate and AQD staff determine compliance at that rate for the emission unit.

6. Note that the results of the retest will be used in conjunction with the results of this test in revising the set operating limits once compliance is determined by AQD staff. If the retest is conducted at different operating conditions, those conditions will impact the operating limit.

NOTICE

You are hereby given notice that the above noncompliance has been documented by the MPCA. This Notice does not preclude the MPCA from taking further action with respect to the above noncompliance.

Please submit responses to this letter directly to:

Supervisor
Compliance Determination Unit
Compliance and Enforcement Section
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road
St. Paul, Minnesota 55155-4194

Mr. Keith J. Buttleman
Page Six
September 26, 1996

If you have questions or comments regarding the content of this letter, please contact
Craig Averman, of my staff, at (612)297-8301.

Your continued cooperation is appreciated.

Sincerely,



Todd J. Biewen, Supervisor
Compliance Determination Unit
Compliance and Enforcement Section
Air Quality Division

TJB:jeh

cc: Ann Seha, Attorney General's Office
Craig D. Averman, AQD
Steve Giddings, AQD
Hans Walter-Peterson, AQD
Permit File No. 879
~~AQD File No. 879~~